



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 9

**75 Hawthorne Street
San Francisco, CA 94105-3901**

NOV 22 1996

RETURN TO COMPLIANCE LETTER

In reply, refer to H-4-1

George Oney
Engineering and Regulatory Affairs Manager
Rollins Oil Process Company, Inc.
5756 Alba Street
Los Angeles, CA 90058

Re: Certification of Violation Correction for the Rollins Oil Process Company, Inc. Facility,
EPA I.D. Number CAD 050 806 850

Dear Mr. Oney:

On July 15, 1996, a hazardous waste investigation was conducted by representatives of the United States Environmental Protection Agency (U.S. EPA) at the Rollins Oil Process Company, Inc. facility in Los Angeles, California, U.S. EPA Identification Number CAD 050 806 850. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended [42 U.S.C. 6927].

The facility's submittal, dated August 13, 1996 adequately addresses the violations which were noted during the inspection and documents the facility's return to compliance with the regulations cited in the inspection report. A copy of the inspection report has been attached. This letter should not be construed as a determination by U.S. EPA of your compliance with any other applicable regulations.

U.S. EPA does have concerns over your facility's practice of temporarily "staging" containers of out going wastes in the main yard of the Rollins OPC facility (see Section VIII of the attached report). While we understand that these containers are being placed there for a short time so that they can be consolidated into roll-off bins, U.S. EPA representatives did observe that the asphalt ground covering was deteriorating near where the containers were being "staged". As a result any accidental release of hazardous waste from any of the containers being staged could result in contamination of the underlying soils. Rollins should ensure that extra care is taken in handling the containers in this area and that spill response equipment is kept close by.

In addition, EPA is extremely concerned about the repeat violations, which have been observed at your facility by the California Department of Toxic Substances Control (DTSC) in recent inspections, specifically the improper storage of incompatible wastes. Additionally, during our last two compliance inspections, EPA also observed repeat violations, specifically, failure to maintain the secondary containment structures for your tank storage area and container storage area. Given this pattern of repeat non-compliance, future violations will be very seriously considered in evaluating your

continued eligibility to accept CERCLA waste under the Off-Site Rule, 40 C.F.R. § 300.440, 58 Fed. Reg. 49200-49218 (Sept. 22, 1993). A copy of the Rule is enclosed.

Please be advised that the U.S. EPA provides copies of investigation reports, upon request, to State agencies, and to the public. Such releases are handled according to the Freedom of Information Act regulations (40 CFR Part 2). If you believe this report contains privileged or confidential information, you may make a claim within fifteen (15) working days from your receipt of this letter. U.S. EPA will construe your failure to furnish a timely claim as a waiver of the confidentiality claim.

If you have any questions please call Dennis Geiser of my staff at (415) 744-2147.

Sincerely,

A handwritten signature in black ink, appearing to read "Arlene Kabei", followed by a small checkmark.

Arlene Kabei, Chief
RCRA Enforcement Section

Enclosure

cc: Florence Gharibian, DTSC Southern California Region



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

RCRA COMPLIANCE EVALUATION INSPECTION REPORT
WASTE MANAGEMENT DIVISION
STATE PROGRAMS AND COMPLIANCE BRANCH

Purpose: RCRA Compliance Evaluation Inspection

Facility Name: Rollins Oil Process Company, Inc.
5756 Alba Street
Los Angeles, CA 90058

EPA ID. Number CAD 050 806 850

Date of Inspection: July 15, 1996

EPA Inspectors:

Susan Ferris,
Environmental Protection Specialist
415-744-2124

Dennis Geiser,
Environmental Engineer
415-744-2147

Facility
Representatives:

George Oney,
Engineering and Regulatory Affairs Manager

Desmond I. Phillip,
General Manager

Chris Lilley,
Technical Manager

Richard Iniguez,

Date of Report: September, 1996

**RCRA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IX
WASTE MANAGEMENT DIVISION
STATE PROGRAMS AND COMPLIANCE BRANCH**

I. INTRODUCTION

On July 15, 1996, U.S. Environmental Protection Agency inspector/compliance officers Susan Ferris and Dennis Geiser arrived at Rollins Oil Process Company (herein referred to as "Rollins" or "the facility"), EPA Identification Number CAD 050 806 850, to conduct a RCRA Compliance Evaluation Inspection ("CEI"). As a result of past compliance issues identified by the California Department of Toxic Substances Control (DTSC), this inspection was focused on the facility container storage areas. The facility was evaluated for compliance with the hazardous waste container management terms and conditions of the 1990 Hazardous Waste Facility Permit, and applicable regulations in Title 22 California Code of Regulations (CCR) Division 4.5 and 40 Code of Federal Regulations (CFR) Parts 261, 262, 264, 268, and 270. Facility representatives George Oney, Richard Iniguez, Chris Lilley, and Desmond Phillips accompanied the inspectors during the investigation.

II. FACILITY BACKGROUND

Rollins is located at 5756 Alba Street, Los Angeles, California. The facility is a permitted storage, treatment, and transfer facility for off-site generated hazardous wastes. Rollins accepts waste from several industries including (but not limited to) petroleum, plastics, chemicals, and laboratories. Commonly accepted waste streams include industrial wastewater streams containing heavy metals, as well as corrosives, solvents, flammables, and laboratory chemicals.

Rollins is currently operating under a Hazardous Waste Facility Permit which was issued by DTSC on May 29, 1990. Under this permit, Rollins is allowed to treat, store, and transfer hazardous waste in tanks and containers, roll-off bins, and to modify the facility according to specified conditions. The Hazardous Waste Facility Permit was scheduled to expire five years from the date of issuance. On November 29, 1994, the facility submitted a permit renewal package to DTSC. In response to the Rollins' permit renewal package, DTSC, on May 29, 1995, granted the facility authorization to continue operations pending a decision on the permit renewal package.

For additional information regarding Rollins' regulatory history and status, please refer to the June, 1995, EPA inspection report, and the January 19, 1996, DTSC inspection report.

III. RECENT COMPLIANCE HISTORY

On June 6, 1995, U.S. EPA personnel conducted a RCRA CEI at Rollins. The inspectors

Rollins Oil Process Company, Inc.
RCRA Compliance Evaluation Inspection
CAD 050 806 850

cited the facility for the following potential violations: i) failure to have a containment system in accordance with the facility operating plan (namely, free of cracks), ii) failure to file an exception report, and iii) failure to operate the facility in a manner that minimizes the possibility of fire, explosion, or any unplanned release of hazardous waste (or constituents) to the air, soil, or water. The facility adequately addressed these violations and was issued a return to compliance letter on September 26, 1995.

In December 1995, DTSC conducted a CEI at the facility and noted the following violations as detailed in their January, 1996 inspection report: i) storage of incompatible wastes without any means of separation, ii) inadequate inspection logs, and iii) inadequate container labeling. On April 24, 1996, DTSC issued Rollins an enforcement order with penalties for the improper storage of incompatible wastes and inadequate inspection logs. At the time of this report, settlement is pending on these issues.

On May 31, 1996 DTSC conducted a follow-up inspection to ensure that the facility adequately addressed the violations cited during the December 1995 inspection. DTSC inspector Carlos Ortega cited the facility for one repeat Class I violation for the storage of incompatible wastes without any means of separation.

Please refer to previous inspection reports for additional historical compliance information.

IV. FACILITY PROCEDURES

Facility representatives informed inspectors that Rollins employs the same procedures for tracking and processing waste, treating wastewater, and operating the facility's air pollution control system as they had at the time of the last EPA RCRA CEI conducted June 6, 1995. However, starting July 18, 1996 the facility will be updating their system to enable them to use a bar code system as part of their drum tracking procedures. There will be two parts of the bar code "sticker" each marked with the unique bar code number. One part of the sticker will remain on the drum and the other can be removed from the drum and place on the sample container. This will help ensure drums and their associated samples are not mixed up. Please refer to the July, 1995 EPA inspection report for a detailed description of these procedures, and Attachment A for an example of the new work sheet and labels that will now be used.

V. SITE INVESTIGATION

As stated previously, the purpose of this inspection was to determine if the facility was managing its hazardous waste containers in accordance with the requirements of the facility permit and State and federal hazardous waste management regulations. EPA staff inspected

the outside container storage area and the container storage warehouse (Photo 1 and Attachment B). During the inspection EPA staff noted the following conditions and requested that facility representatives submit documentation to EPA showing that these concerns have been addressed.

A. Container Storage Area

Field Observations:

1. EPA inspectors noted that twelve (12) drums containing RCRA-regulated hazardous waste were not marked with the date received on-site as required by Condition III.C.1.d.5 of the DTSC Hazardous Waste Facility Permit. Below is a list of these drums.

- Rollins Drum Tally Sheet # 33800
- Rollins Drum ID Bar Code # 198931
- Rollins Drum ID Bar Code # 198930
- Rollins Drum ID Bar Code # 172260
- Rollins Drum ID Bar Code # 178786
- Rollins Drum ID Bar Code # 196480
- Rollins Drum ID Bar Code # 199479
- Rollins Drum ID Bar Code # 172266
- Rollins Drum ID Bar Code # 193644
- Rollins Drum ID Bar Code # 200432
- Rollins Drum ID Tally Sheet # 40186
- Drum marked "Adv.-35-96", OP-11833-852, 8/CLA/TREAT

According to facility, the daily inspection of the container storage area had already been conducted for the day. A review of the inspection log for July 15, 1996 found that the log stated that all drums in the container storage area were marked with the "OPC date received" (see Attachment D). No improper storage of incompatible wastes was observed in this area. No open or leaking drums were observed in this area.

Action Taken By Facility:

Facility representatives stated that they could obtain the date received for each of the identified drums from their own internal tracking system and through the manifests. By the end of the inspection Rollins personnel had begun to mark the dates received on these drums. Facility representatives also stated that they would talk with the personnel responsible for conducting the daily inspections to ensure that these omissions will not occur in the future. On August 13, 1996, Rollins submitted information to EPA indicating the date received for all the drums listed above in item

1 (See Attachment C). None of the drums had exceeded the one-year storage limit.

B. Roll-off Storage Area

Field Observations:

1. The "Roll-off Storage Area" is located adjacent to the container storage area. It is referred to as the "Filter Press Container Storage Area" in the facility permit. At the time of inspection, inspectors noted that the storage area's concrete base was cracked and that the epoxy sealant was peeling off (Photo 4,5). It was explained to Rollins' personnel that they are required by the facility permit to maintain the base of the storage area so that it is kept free of cracks. Specifically, Permit Condition III.C.1.j.1 requires that "each hazardous waste storage area shall have a base that is free of cracks and gaps.."

In addition, Condition II.F.2 specifies that the "owner or operator shall operate and maintain the facility in accordance with the Operation Plan.." Volume I, Section VI of the approved September 1989 Part B Permit Application specifies that the storage area will be inspected periodically and "any cracks or gaps which may develop will be repaired and sealed." In addition, design drawing C-1 in the approved Part B Permit Application specifies that "Concrete sealer shall be one coat of Sika Guard 62. Sika Guard 62 shall be applied in strict accordance with the manufacturers recommendation."

No improper storage of incompatible wastes was observed in the Roll-off Storage Area. No open or leaking drums were observed in this area.

Actions Taken By Facility:

Facility representatives stated that they would initiate a work order to have the entire containment pad of the Roll-off Storage Area sealed with a new epoxy coating which would also seal all of the cracks in the concrete. On August 13, 1996, Rollins submitted documentation showing a newly applied epoxy sealant in this area (see Attachment C).

C. Container Storage Warehouse

Field Observations:

1. One 55-gallon drum from "J.D. Harp Furniture Finisher" was marked with a hazardous label with "VOID" written across it. The container was not marked with a date received, a Rollins identification tag number, nor any other identifying information as

required by Condition III.C.1.d of the DTSC Hazardous Waste Facility Permit. Facility representatives were unable to provide additional information about this drum at the time of inspection (Photo 2, 3).

2. Next to the drum from "J.D. Harp Furniture Finisher" was a 55-gallon container from "Northrop" which was not marked with the date it was received on-site as required by Condition III.C.1.d.5 of the DTSC Hazardous Waste Facility Permit.

No improper storage of incompatible wastes was observed in the container storage warehouse. No open or leaking drums were observed in this area.

Actions Taken By Facility:

On August 13, 1996, Rollins submitted information indicating the contents of the drums and the date received as well as a copy of the manifest that accompanied the waste to Rollins (see Attachment C). Both drums were within the one-year storage time.

VI. DOCUMENT REVIEW

EPA focused its document review on the daily facility inspection logs. A review of the facility inspection logs found that the facility is conducting daily inspections as required by the facility permit. However, none of the inspection logs reviewed documented any of the drum labeling deficiencies or the deterioration of the containment pad for the Roll-off Storage Area. The inspection log completed the morning of inspection (July 15) does not indicate that any drums were not marked with the date received on-site. Abby Purhassanian, Rollin's staffperson responsible for conducting inspections, informed inspectors that he routinely checks for the hazard class, labels, and leaks on all containers. He stated that if he finds a deficiency, he takes care of the problem right away and notes the problem on the inspection log. Mr. Purhassanian could not provide any explanation as to why the deficiencies observed by inspectors were not noted in the July 15 inspection log.

Rollins was advised that failure to properly document required information in the inspection schedule is a violation of the facility permit. Facility representatives stated that they would see that the daily inspection logs are thoroughly completed in the future.

VII. POTENTIAL VIOLATIONS THAT HAVE BEEN CORRECTED BY THE FACILITY

The following potential violations of 1990 Hazardous Waste Facility Permit, which were observed during the focused compliance inspection have been corrected by the facility:

1. Permit Condition II.F.2 specifies that the "owner or operator shall operate and maintain the facility in accordance with the Operation Plan.." Volume I, Section VI of the approved September 1989 Part B Permit Application specifies that the storage area will be inspected periodically and "any cracks or gaps which may develop will be repaired and sealed."

On the date of the inspection, July 15, 1996, EPA inspectors noted that the permitted Roll-off storage area's concrete base was cracked and that the epoxy sealant was peeling off

Action taken by facility:

See Section V.B.1 of this report.

2. Permit Condition III.C.1.d.5 specifies that all containers shall be labeled with the date of acceptance at the storage facility.

On the date of the inspection, July 15, 1996, Rollins failed to mark the date of acceptance onto fourteen (14) containers of RCRA-regulated hazardous waste.

Action taken by facility :

See Section V.A.1 and V.C.1 & 2 of this report.

3. Permit Condition III.C.j.1 specifies that each hazardous waste storage area shall have a base free of cracks and gaps.

On the date of the inspection, July 15, 1996, EPA inspectors noted that the permitted Roll-off storage area's concrete base was cracked and that the epoxy sealant was peeling off

Action taken by facility:

See Section V.B.1 of this report.

4. Permit Condition III.L.1 specifies that the owner or operator shall inspect the facility

for malfunctions and deterioration, operator errors, and discharges which may cause or may lead to the release of hazardous constituents to the environment or a threat to human health.

Rollins failed to adequately inspect the facility for malfunctions and deterioration, operator errors, and discharges which may lead to the release of hazardous waste constituents to the environment or a threat to human health. Specifically, Rollins failed to identify containers without the date of acceptance, cracks in the concrete storage pad, and peeling epoxy during routine inspections.

Action taken by facility:

See Section V of this report.

5. Permit Condition III.L.6 specifies that owner of operator shall remedy any deterioration or malfunction of equipment or structures.

Rollins failed to ensure that each hazardous waste storage area had a base free of cracks and gaps. Specifically, the Roll-off Bin Storage Area's epoxy coating was peeling off and the underlying concrete pad was cracked.

Action taken by facility:

See Section V.B.1 of this report.

VIII. OTHER SITE CONCERNS

"Staging" of Hazardous Wastes Within the Main Facility Yard

During the inspection, EPA personnel observed approximately ten, double stacked pallets of containers located within the main facility yard (see Photographs 1, 6 and 7). Thirty four (34) of the containers were marked as containing RCRA regulated hazardous wastes (see Photograph 6). Two double stacked pallets and the bottom of another double stacked pallet held large DOT approved cardboard boxes of EPA waste Code D007 (total of five boxes). The remaining pallets held 55-gallon drums.

The following is a list of containers/waste in this area which were labeled as containing RCRA regulated hazardous wastes:

Rollins Drum ID Bar Code #:

201883, 201884, 202032, 202034, 202036, 202033, 202035, 202255, 202265, 202236, 202270, 202097, 202098, 202063, 202252, 201986, 201884, 201883, 201882, 202073, 202072, 202071, 202070, 202068, 202068, 202067, 201992, 201905, 201908, 201916, 202065, 201890, 201896, 201891

According to facility representatives, these containers were being "staged" in this area for the purpose of processing and consolidation into a roll-off bin. Rollins personnel explained that the waste material is "simple debris" that does not require testing and can therefore be processed quickly. Mr. Robert Iniguez stated the drums were brought out from the inside storage area "today" (July 15) and would be moved and processed the same day. Facility representatives stated that containers are "staged" in this area for approximately one to two days.

The facility permit and Operations Plan are both silent this practice of "staging" containers in the main facility yard. EPA's primary concern regarding this matter is that the asphalt in the facility yard is cracked and deteriorating in some areas. Any spill of hazardous waste in this area could result in the contamination of the underlying soils. Rollins personnel should ensure that extra care is taken in handling the containers in this area and that spill response equipment is kept close by.

ATTACHMENTS

DEVELOPMENT
08/09/96 03:12PM

ROLLINS OPC. INC
Drum Tally Worksheet

Attachment A

Customer: REI
Manifest: CA93080149

Order : 014433*11 EPA Id: CAD982510679
Stream : 023707 Cont'r: PALL807
Product: 807 DRUMS, CRUSHED: LANDFILL

Serial #	Drum# PG#LN	GEN Unique Drum #	S.G. IHM	Drum		Totl Gals	Phse Gals	Hi-V Gals	Rliq Gals	Slid Gals	Acid		Comments
				Size Type	LBs.						Base pH		
800004169	1	001A											
800004170	2	001A											
800004171	3	001A											
800004172	4	001A											
800004173	5	001A											
800004174	6	001A											

SAMPLE: _____ Rad Screen (<= 25 u R/hr.)
_____ Passed _____ Failed

LABORATORY

Sample #	Total Drums	Drum # (Composite)	VISC*	BTUM	HG(7471)	Conform		Compat*		Disposition/Surcharge/Comments
						Yes	No	Yes	No	

vis Method (9040), *IMH=In House Method

PROBLEM DISPOSITION

Step 1: _____ Count Discrepancy _____ Non-Conforming _____ Return Authorization

Step 2: Explanation: _____

Recorded by: _____ Date: _____
Step 3: Technical: _____ Recorded by: _____ Date: _____

Step 4: Customer Service:

Contact: _____ Date/Time _____
_____ Hold _____ Process _____ Return
(Based upon Step 3 above customer authorization)

Step 5: Final Disposition: (Note actions taken and additional information attached)

_____ Scheduling/Receiving: _____ Operations/Other: _____

Order : 014483*11 EPA ID: C60982610679
Stream : 0230-07 Cont'n: FALL801
Project: SUT ONLINE, CRUSHER: LANDFILL

[illegible]

Page 10 of 10

Bill Type	Topic	Author	Effective Date	WFO	Enrolled	HS 7410	Confirms	Confirms	Disposition/Supplement/Comments		
							Yes	No	Yes	No	
SB 1001	Health Care	Sen. Mark Harris	01/01/2010	WFO	Enrolled	HS 7410	Yes	No	Yes	No	SB 1001
SB 1002	Health Care	Sen. Mark Harris	01/01/2010	WFO	Enrolled	HS 7410	Yes	No	Yes	No	SB 1002
SB 1003	Health Care	Sen. Mark Harris	01/01/2010	WFO	Enrolled	HS 7410	Yes	No	Yes	No	SB 1003
SB 1004	Health Care	Sen. Mark Harris	01/01/2010	WFO	Enrolled	HS 7410	Yes	No	Yes	No	SB 1004
SB 1005	Health Care	Sen. Mark Harris	01/01/2010	WFO	Enrolled	HS 7410	Yes	No	Yes	No	SB 1005
SB 1006	Health Care	Sen. Mark Harris	01/01/2010	WFO	Enrolled	HS 7410	Yes	No	Yes	No	SB 1006
SB 1007	Health Care	Sen. Mark Harris	01/01/2010	WFO	Enrolled	HS 7410	Yes	No	Yes	No	SB 1007
SB 1008	Health Care	Sen. Mark Harris	01/01/2010	WFO	Enrolled	HS 7410	Yes	No	Yes	No	SB 1008
SB 1009	Health Care	Sen. Mark Harris	01/01/2010	WFO	Enrolled	HS 7410	Yes	No	Yes	No	SB 1009
SB 1010	Health Care	Sen. Mark Harris	01/01/2010	WFO	Enrolled	HS 7410	Yes	No	Yes	No	SB 1010

on the other hand, the β -phase is not observed.

SFC # _____ Non-Conforming _____ Return Authorization _____

Recorded by: _____ Date: _____

Filed: 01/24/2014 Page: 1 of 1
Recorded by: _____ Date: _____

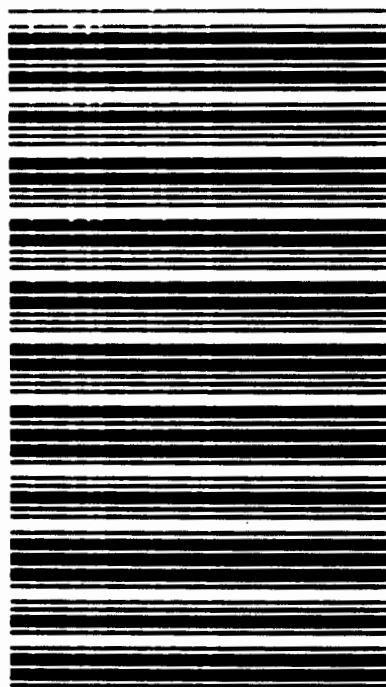
Notes: 1. *Chlorophyll a* and *Chlorophyll b*.

Contract	Date/Time	Hold	Process	Return
1	2010-01-01 10:00			
2	2010-01-01 10:00			
3	2010-01-01 10:00			
4	2010-01-01 10:00			
5	2010-01-01 10:00			
6	2010-01-01 10:00			
7	2010-01-01 10:00			
8	2010-01-01 10:00			
9	2010-01-01 10:00			
10	2010-01-01 10:00			
11	2010-01-01 10:00			
12	2010-01-01 10:00			
13	2010-01-01 10:00			
14	2010-01-01 10:00			
15	2010-01-01 10:00			
16	2010-01-01 10:00			
17	2010-01-01 10:00			
18	2010-01-01 10:00			
19	2010-01-01 10:00			
20	2010-01-01 10:00			
21	2010-01-01 10:00			
22	2010-01-01 10:00			
23	2010-01-01 10:00			
24	2010-01-01 10:00			
25	2010-01-01 10:00			
26	2010-01-01 10:00			
27	2010-01-01 10:00			
28	2010-01-01 10:00			
29	2010-01-01 10:00			
30	2010-01-01 10:00			
31	2010-01-01 10:00			
32	2010-01-01 10:00			
33	2010-01-01 10:00			
34	2010-01-01 10:00			
35	2010-01-01 10:00			
36	2010-01-01 10:00			
37	2010-01-01 10:00			
38	2010-01-01 10:00			
39	2010-01-01 10:00			
40	2010-01-01 10:00			
41	2010-01-01 10:00			
42	2010-01-01 10:00			
43	2010-01-01 10:00			
44	2010-01-01 10:00			
45	2010-01-01 10:00			
46	2010-01-01 10:00			
47	2010-01-01 10:00			
48	2010-01-01 10:00			
49	2010-01-01 10:00			
50	2010-01-01 10:00			
51	2010-01-01 10:00			
52	2010-01-01 10:00			
53	2010-01-01 10:00			
54	2010-01-01 10:00			
55	2010-01-01 10:00			
56	2010-01-01 10:00			
57	2010-01-01 10:00			
58	2010-01-01 10:00			
59	2010-01-01 10:00			
60	2010-01-01 10:00			
61	2010-01-01 10:00			
62	2010-01-01 10:00			
63	2010-01-01 10:00			
64	2010-01-01 10:00			
65	2010-01-01 10:00			
66	2010-01-01 10:00			
67	2010-01-01 10:00			
68	2010-01-01 10:00			
69	2010-01-01 10:00			
70	2010-01-01 10:00			
71	2010-01-01 10:00			
72	2010-01-01 10:00			
73	2010-01-01 10:00			
74	2010-01-01 10:00			
75	2010-01-01 10:00			
76	2010-01-01 10:00			
77	2010-01-01 10:00			
78	2010-01-01 10:00			

(Based upon Step 3 above customer authorization)

Step 3. Final Disposition (Note actions taken and additional information attached)

INVESTIGATION/OPERATIONS/OTHER: _____

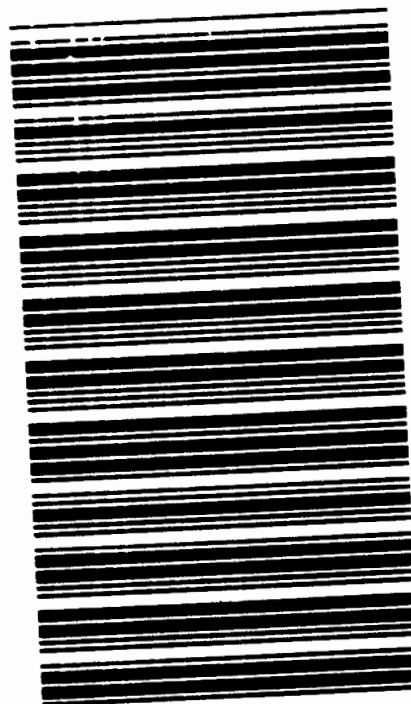


CUSTOMER:
REI
STREAM-PROD:
023707-807 (01)
ORD-IM/RCVDT:
014433-11 08/01/96
CONT: PLANT:
PALL807 OPC
TRAILER:
DB 7943A
MNFST-PG-LN:
CA93060148-001-A

800004171 3
HAZARDOUS WASTE



Serial Number: 800004171
Customer: REI
Ord-Im/Rcvdt: 014433-1108/01/96
Mnfst-Pg-Ln: CA93060148-001-A



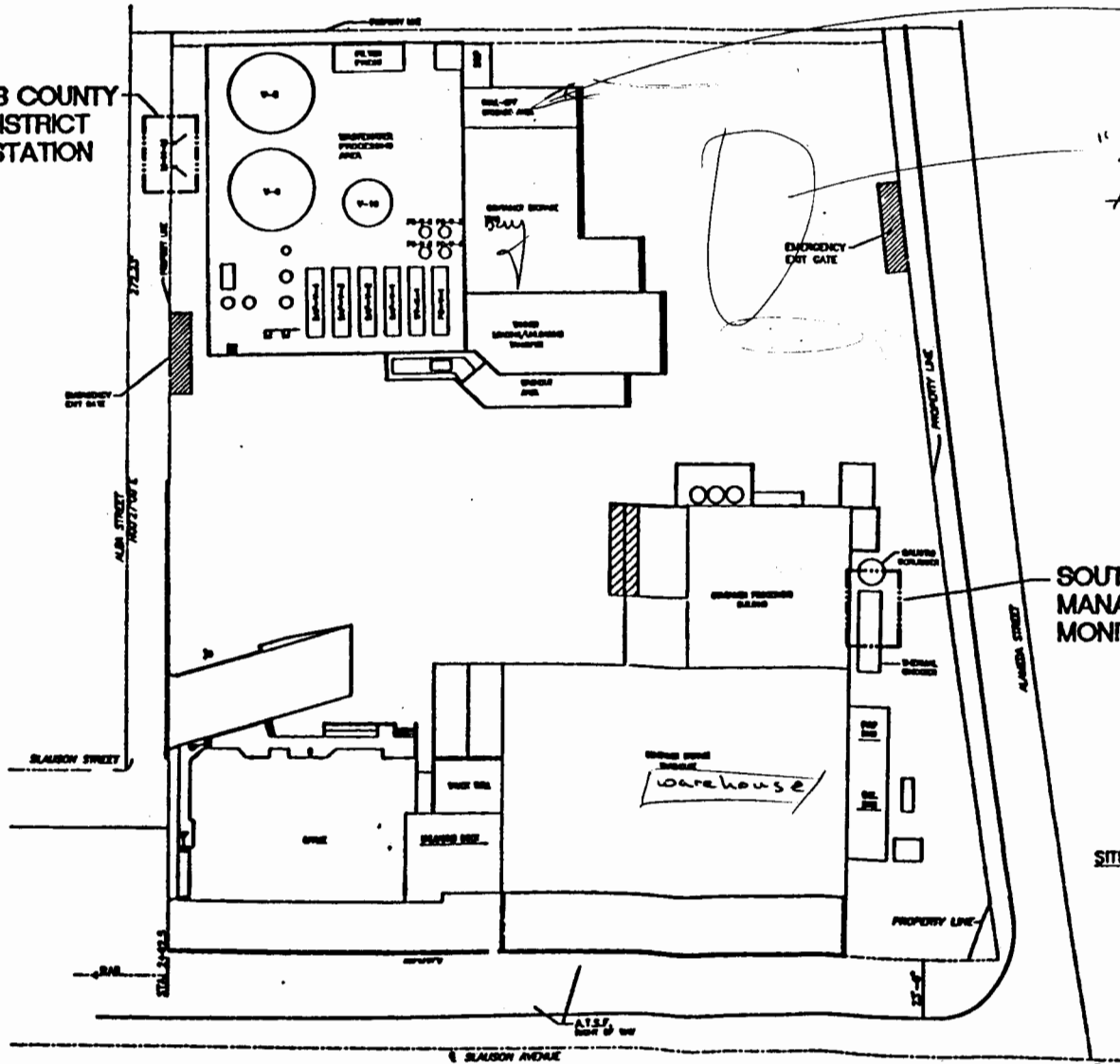
CUSTOMER:
REI
STREAM-PROD:
023707-807 (01)
ORD-IM/RCVDT:
014433-11 08/01/96
CONT: PLANT:
PALL807 OPC
TRAILER:
DB 7943A
MNFST-PG-LN:
CA93060148-001-A

800004170 2
HAZARDOUS WASTE



Serial Number: 800004170
Ord-Im/Rcvdt: 014433-1108/01/96
Mnfst-Pg-Ln: CA93060148-001-A

ANGELES COUNTY
WATER DISTRICT
PUMP STATION



cracks

"Staged Hw"
+ 1 roll off bin with
Hw label.

SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT
MONITORING STATION

SITE PLAN



DATE	DESCRIPTION	BY

6

ROLLINS **ORC** INC.

DESIGNER	
CAD OPERATOR	
CHECKER	
PROJECT MANAGER	

1995 RCRA PART 8 PERMIT RENEWAL DRAWINGS
8750 ALMA ST. LOS ANGELES CA
ENVIRONMENTAL MONITORING STATIONS/TOUP

SCALE 1"=30'-0"
PROJECT NUMBER
DRAWING NUMBER P007-00-119



8/3/96 "Rolloff Containment Area"

Date: 7-15-96

CONTAINER STORAGE PAD / CONTAINER STORAGE WAREHOUSE

- | | | |
|-----|--|---------|
| 1. | Are DIKED STORAGE AREAS Contained Storage Areas free of cracks/breaks/leaks?..... | Yes/ No |
| 2. | Is adequate AISLE SPACE (24 inches) present between drums?..... | Yes/ No |
| 3. | Is each CONTAINER STORAGE AREA free of Rainwater?..... | Yes/ No |
| 4. | Are Spill-Kits nearby? | Yes/ No |
| 5. | Are all DRUMS in storage areas | |
| | (A) Tightly Closed | Yes/ No |
| | (B) Free From Sever Rusting?..... | Yes/ No |
| | (C) Free From Bulging?..... | Yes/ No |
| | (D) Free From Leaks?..... | Yes/ No |
| | (E) Stored on Pallets?..... | Yes/ No |
| 6. | Are all DRUMS marked with a | |
| | (A) Hazardous Waste Label?..... | Yes/ No |
| | (B) With Their Contents..... | Yes/ No |
| | (C) Are Labels Visible?..... | Yes/ No |
| | (D) OPC Received Date? | Yes/ No |
| 7. | Are all DRUMS segregated by Hazard Class?..... | Yes/ No |
| 8. | Are all DRUMS that contain waste stored in storage areas?..... | Yes/ No |
| 9. | Do STORAGE AREA PLACARDS properly describe waste contained?..... | Yes/ No |
| 10. | Is a Portable Radio or a Telephone easily accessible and working for emergencies?..... | Yes/ No |
| 11. | Is PERSONAL PROTECTIVE EQUIPMENT (PPE) available nearby? | Yes/ No |
| 12. | Are the EYEWASH/SHOWERS in working condition? | Yes/ No |
| 13. | Are the (6) FIRE EXTINGUISHERS accessible/charged/sealed?..... | Yes/ No |
| | (Fire-Extinguishers Numbers 17, 18, 19, 22, 23, 24) | |

CONTAINER STORAGE AREA "B" (ROLLOFF / BULK LIQUID)

- | | | |
|----|---|----------|
| 1. | Are bulk liquid or rolloff CONTAINMENT AREAS free of Leaks/Spills? | Yes / No |
| 2. | Are all trailer HATCHES and CAPS secured? | Yes / No |
| 3. | Are all ROLLOFFS CONTAINERS: | |
| | (A) Securely Tarped? | Yes / No |
| | (B) Has More than one Hazardous Waste Labels? | Yes / No |
| | (C) Hazardous Waste Labels properly identified the content of the container? | Yes / No |
| 4. | Are yard VACUUM HOSES in good CONDITION/SAFE and free of tears or smashed sections? | Yes / No |
| 5. | Are proper MANIFEST and/or Labels attached to all trailers and rolloffs? | Yes / No |
| | (A) Are manifest signed off by OPC? | Yes / No |
| | (B) Are Accumulation Start Dates on Labels? | Yes / No |
| | (C) Is load going to another TSD? | Yes / No |
| | (D) Has it been here for more than 6 days? | Yes / No |
| 6. | Are all loaded trailers and rolloffs properly FLACARDED? | Yes / No |
| 7. | Is containment area and yard free from SPILLS/DEBRIS (pails,pallets,trash)? | Yes / No |

If any items are marked (No), list item # with comments and corrective actions taken by inspector.

[illegible]

PHOTO LOG

Date of Inspection: July 15, 1996

Facility: Rollins Oil Process Company, Inc.

EPA ID. Number CAD050806850



Photo 1 Overview of Rollin OPC's main yard. The entrance to the site is to the far left. The covered area to the left is the permitted drum storage area. In the center of the picture near the trailers is a "staging area" containing drums and containers of hazardous waste. Note: Facility representative said these containers were being processed and would be removed within a day or two.



Photo 2 One 55-gallon drum from "J.D. Harp Furniture Finisher" was marked with a hazardous label with "VOID" written across it. The container was not marked with a date received (Photo 4, 5).



Photo 3 Close-up of drum label seen in photo 2.

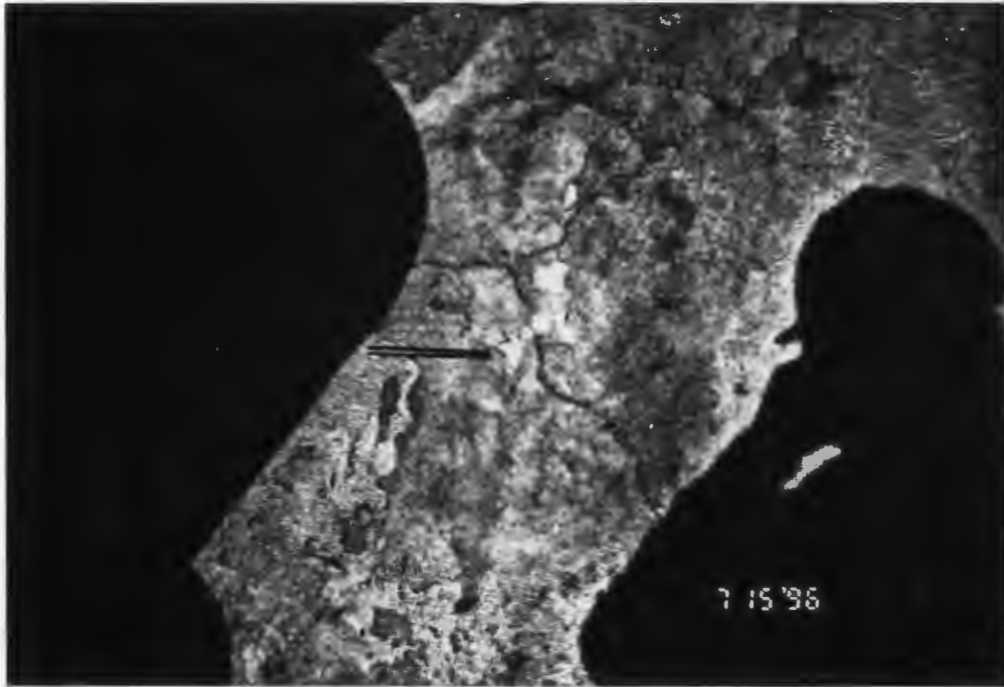


Photo 4 Surface of the Roll-off Bin Area. Note the cracked surface and peeling epoxy sealant.



Photo 5 Surface of the Roll-off Bin Area. Note the cracked surface and peeling epoxy sealant.



Photo 6 Drum staging area. Here, inspectors noted approximately ten, double stacked pallets. Facility representatives informed inspectors that the waste in this area is kept here for approximately one to two days.



Photo 7 Overview of area pictured in photo 6.